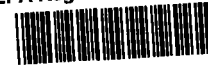




May 22, 1984

EPA Region 5 Records Ctr.



382814

CERTIFIED MAIL

Illinois Environmental Protection Agency, Region V  
Division of Land Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62706

Dear Sirs:

Included herein is a revised confidential Part A Application for operation during interim status of a hazardous waste storage and treatment facility for the Olin Corporation, Main Plant Facility, East Alton, Illinois. Olin is claiming a portion of this application as a trade secret, specifically six maps identified as RCRA Part B Map ID No's: 19-3, 19-4, 19-6, 19-7, 19-8 and 19-9. Olin requests the Agency to protect this application from public disclosure. The maps which are claimed as Trade Secret are clearly marked as such. A copy of a statement of justification for Olin's claim of Trade Secret is attached. The original justification was sent to Mr. L.W. Eastep on April 2, 1984 along with Olin's Part B Application.

A copy of this revised Part A Application has also been submitted to the U.S. EPA.

This revision is identified herein as Revision F.

Very truly yours,



L.W. Maxson, Director  
Energy & Environmental Services

Attachment

WJG/tec

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E.P.A. — D.L.P.C.  
STATE OF ILLINOIS

CLAIM OF TRADE SECRET

STATEMENT OF JUSTIFICATION

Re: RCRA Part B Permit Application  
Olin Corporation, East Alton, IL

In compliance with the state of Illinois Rules and Regulations, Title 35, Subtitle A, Chapter I, Part 120, Olin Corporation, Winchester Group, hereby submits a Statement of Justification for those portions of Olin Corporation's RCRA Part B Application (the "Application") for which a claim of Trade Secret has been made.

The Application should be safeguarded and withheld from persons other than those selected by Olin Corporation to have access thereto for limited purposes by 1) limiting the number of available copies and 2) reviewing requests for the information. Presently, three (3) copies of the Application are maintained by Olin. The following is list of those retaining the copies:

Winchester Environmental Coordinator  
Director of Energy and Environmental Services  
Brass Group Legal Department

There are no plans for printing additional copies of the Application. If, however, a request is received for a copy of or information contained within the Application, the request will be reviewed by the Olin department with whom the request was made. In order to determine that the information contained within the Application was accurate, a review of the the information was made. The information was disclosed to the following people:

Winchester Environmental Coordinator  
  
Director of Energy & Environmental Services  
and selected staff members  
  
Brass and Winchester Legal Counsels  
  
Manager of Winchester Facilities Engineering

It is hereby certified that Olin Corporation has no knowledge that the Application or any portion thereof has ever been published, disseminated or otherwise become a matter of general public knowledge.

The following is an explanation of the competitive value of those portions of the Application for which a claim of Trade Secret has been made.

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RCRA Map Nos. 10-2 and 19-10

These maps reveal the location of major Winchester manufacturing areas in Zone 1. From these maps Winchester's competitors could determine building size and location, estimate fixed costs (e.g. utilities) and, in conjunction with other information which they may already have, determine production capacities.

RCRA Map Nos. 19-3 and 19-4

These maps are aerial photographs of Zone 1 which include both Winchester and Brass operations. Information concerning building location, estimated size and fixed costs can be obtained.

RCRA Map Nos. 10-3, 19-6, 19-7, 19-8, 19-9

These maps are topographic drawings of Zone 4. They reveal the location of the major manufacturing areas in the zone. From these maps Winchester's competitors could determine building size and location, estimate fixed costs and relate this information to production capacity.

RCRA Map No. 19-11

This map is a sewer drawing of Zone 4. Major Winchester manufacturing areas are located on this drawing. Information concerning building size and location, fixed costs and production capacity can be obtained from this drawing.

Olin Dwg. No. 316A-01-03-02

This drawing reveals the primer mix kill operation in Bldg. 316A. The drawing reveals the flow of material and tank sizes. By making an assumption of the volume of waste in the tanks Winchester's competitors could estimate primer production and, with additional information, the volume of ammunition produced.

Olin Dwgs. 209-01-04-04, 209-01-08-01, 209-01-06-01

The major concern with these drawings is they reveal the process used to reclaim scrap, primed rimfire shellcases.

Olin Dwg. 242-4-1-004

This drawing is of Winchester's high explosives operation. It reveals the number of rooms used in the manufacturing of high explosives therefore, allowing the competitors to determine the production capacity.

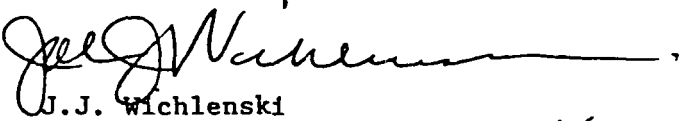
In addition to the aforementioned maps and drawings, a claim of Trade Secret has been made on all of the SOP's (Standard Operating Procedures) contained within the Application and Appendix III. The SOP's reveal Winchester's "KILL" procedures for explosives waste and operation of the ultrasonic cleaning system. These procedures could be unique to the ammunition industry and therefore offer important information to

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STATE OF ILLINOIS

Winchester's competitors. Appendix III reveals information concerning the rotary destruct furnace at the Material Reclaim Facility (MRF). This unit is used to thermally destruct residual priming mix on scrap primers. Considerable work was involved in developing this treatment process and should information concerning it be revealed to Winchester's competitors, they could save a great deal of time and money in developing one of their own.

  
J.J. Wichlenski  
Director Ammunition Operations *SL*

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OLIN MAIN PLANT FACILITY  
U.S. EPA ID# ILD006271696  
HAZARDOUS WASTE PART "A" PERMIT APPLICATION  
REVISION F 4/25/84

The following items describe the changes made within this facility that constitutes this revision to the original Part "A" application submitted to the U.S. EPA on November 14, 1980.

1. Elimination of Site 1-2  
Waste previously stored at this site is now stored at Site 1-9.
2. Elimination of Site 1-13  
Waste previously stored at this site is now stored at Site 1-12.
3. Addition of Process Code S04, Line Number 7, Page 1 of 5, RCRA Form 3.

This listing was included with Olin's original Part "A" application (11/14/80). It was then removed with Olin's first revision to the Part "A" (11/17/81) due to the expectation of the U.S. EPA "delisting" the waste sometimes stored in the surface impoundment. As of this date, Olin has not been granted the "delisting", therefore, Olin is replacing the S04 listing as part of its Part "A" application for interim status.

4. Addition of Process Code S04, Line Number 19, Page 3c of 5, RCRA Form 3.

Same reason as in #3 above.

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5. The Master Drawing of the Main Plant Facility and the fourteen drawings that show the location of Olin's treatment/storage sites (Pages 5a thru 5o of 5), RCRA Form 3 have been consolidated onto the following drawings:

<u>Olin RCRA Part B</u> <u>Map I.D. No.</u>	<u>Site Numbers</u>
19-2	Master Drawing (all sites)
19-3	1-1,1-5,1-6,1-8,1-9
19-4	1-3,1-4,1-7,1-12,1-17,1-18
19-5	1-11 (includes S04 surface impoundment)
19-6	4-8,4-9
19-7	4-1,4-5
19-8	4-2a,4-2b,4-2c,4-2d,4-2e,4-3
19-9	4-4
10-5	3-1

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- 4-1 A 4500 gallon stainless steel storage tank for spent acid is located on a concrete pad in a bermed area which also surrounds two acid (product) tanks. Limestone in the bottom of the bermed area is present to neutralize a possible acid spill.
- 4-2a An outdoor fenced area (250,000 sq.ft.) with crushed rock over soil is the storage area for collection of containerized waste from all parts of the Olin facility. No secondary containment. A smaller area (about 30' X 40') to the northeast within 4-2a is fenced and contains waste solvents (12 drums), magnesium waste (30 drums), and mercury waste (20 drums). Drums were on pallets one high, labelled, and segregated by waste type. This area is compartmentalized by fences for six different waste types. Mercury wastes were under plastic. No secondary containment.
- 4-2b This indoor tank treats off-spec product by separating paper and plastic from brass components. Paper and plastic are removed to a landfill, brass is reclaimed in-house. No permit required.
- 4-2c A rotary destruct furnace in the same building with 4-2b destroys primer on off-spec brass parts received from 4-2b. No permit required.
- 4-2c One storage area and one treatment tank make up 4-2c. The treatment tank is an outdoor, in-ground 3000 gallon concrete tank 8-10' deep with a steel cover. Sludge (paper, plastic and water from 4-2b) settles and waste water is discharged to WWT. The sludge is vacuum pumped and removed every 6-8 weeks to a landfill. No secondary containment is provided during the removal of sludge from this tank. This is no monitoring of the underground tank.
- The storage area is located outdoors on crushed rock. A 15 cubic yard dumpster collects sump sludge (paper and plastic) from above treatment tank. The sludge is disposed off-site.
- 4-2e An open 200 gallon stainless steel tank is set on concrete inside the building with 4-2b and 4-2c. This "kill" tank treats off-spec explosives primer (product). No secondary containment. No permit needed.
- 4-3 The incinerator is about 8-10 years old according to Mike Roark. It (4-2d is located outdoors, partly under roof. All necessary permits have on been obtained from APC to burn smokeless powder on fiberpaks and plans) rags and sponges contaminated with primer and carbon. Wastes are transported to 4-2a for storage.
- 4-4 Three outdoor in-ground concrete tanks each with a wooden cover are used for settling of solids in the priming mix wastewater used in Research and Development. Solids are removed once per year. Wastewater flows continuously to WWT. The largest tank is approximately 3' X 3' X 3' deep. The other two tanks are 3' X 1½' X 3' deep. All tank tops are 3-4" above ground level. No secondary containment or monitoring.

November 20, 1981

Thomas E. Cavanagh/Eugene P. Theios

Page 5

- 4-5 An outdoor, under roof, 2000 gallon open steel tank 6' deep set in concrete treats small arms ammunition priming mix wastewater. A concrete curb is 1' high on three sides. No monitoring. Solids removed, wastewater to WWT.

A small storage area for collection of 30-gallon fiberpaks containing solids from 4-5 (treatment) is stored up to two weeks maximum, then transferred to 4-2a. Containers are on a flat concrete slab with a 1' retaining wall on one side. No secondary containment. No permit needed.

- 4-7 Three storage areas are for spent paint solvents. Two small areas are for storage of one drum each. Drums are used for accumulation of solvent at point of generation. No secondary containment. No permit needed.

The third drum storage area contains 4 drums of waste solvent on pallets outside on concrete. No secondary containment. Immediately adjacent to the drummed solvents were 45 drums of ethylene glycol (product) and a lesser number of drums containing ballistic sand (waste?). No buffer was observed between waste types. Wastes are removed to 4-2a prior to removal from facility.

SAS/LJK/rr

cc: Bill Child  
Southern Region  
Division File  
Diane Spencer - Southern Region